

STATE OF OHIO  
CITY/COUNTY OF Cincinnati/Hamilton

CASE NAME Ngo vs CINCINNATI, C  
CASE NUMBER 221A00639

### AFFIDAVIT (cont.)

written reprimand by Tara Williams on November 4, 1999, and charged with insubordination for failure to comply with a direct order to remove my plants. Later, they moved the plants from their benches and put them on the floor, lab cart or their desks.

When I went on vacation, Beverly Head removed my plants. She did not give me any notice before this. I asked where they were but nobody would tell me. I reported this as a theft to the police on November 22, 1999. Ms. Head returned them to me after about 12 days but: 2 violet plants were missing, the Christmas Tree lost many decorations, and my returned plants were all very dried after about 2 weeks without water. (6)

I have been consistently not given a properly working printer. Tara Williams and Ty Gouda both ignore my request for a printer that works. Everyone else has a printer that works. I am the only Asian from Vietnam in this section. There are 2 Vietnamese males in another section downstairs. One is an Engineer (about age 51-52) and the other is a Waste Water Treatment Specialist (about age 45). There are about 7 Lab Technician II's in my section and 3 Lab Technician III's.

When I had a problem with my computer, Mike Nalley (Computer Specialist, White male American, about age 33) told me my computer was going to be replaced. When the computer replacement arrived, Beverly Head (Superintendent, Black female American, about age 50) and Tara Williams decided to give the new computer to Tim O'Kane (Lab Tech II, White male, about age 40 plus) instead of me. (7) I was not given a new computer until May, 2000.

(8) Tara Williams has given me additional work because she said I can do it. I can not do it because it is 2 peoples job. These job duties were Gerald Beverly's work (Lab Tech II, Black male American, under age 40). He transferred to another group. I believe the work should have been assigned to Ben Cohee (Lab Tech III, White male American, about age 40) as he is doing now. I had volunteered to do 4 out of the 5 things that Gerald Beverly had done, but not the fourth of: digesting samples for Total Nitrogen and Total Phosphorus analyses. That was too much work. Mr. Cohee has always had to do the digesting in the past. I believe

I have read and had an opportunity to correct this Affidavit consisting of \_\_\_\_\_ handwritten ☐ typed ☐ pages and swear that these facts are true and correct to the best of my knowledge and belief.

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_.